

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANNE DE LACOUR, ANDREA
WRIGHT, and LOREE MORAN
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE CO., and
TOM'S OF MAINE INC.

Defendants.

Civil Action No. 1:16-CV-08364 (RA)

**PLAINTIFFS' NOTICE OF MOTION
FOR CLASS CERTIFICATION,
APPOINTMENT OF CLASS
REPRESENTATIVES, AND
APPOINTMENT OF CLASS COUNSEL**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, upon the Declaration of Neal J. Deckant, the Declaration of Colin Weir, the Declaration of J. Michael Dennis, the Declaration of Anne de Lacour, the Declaration of Loree Moran, the Declaration of Andrea Wright, the exhibits attached thereto, and the accompanying Memorandum of Law, Plaintiffs hereby move before the Honorable Ronnie Abrams for an Order, pursuant to Rule 23(b)(3) and Rule 23(b)(2) to: (i) "all persons in the United States who purchased Tom's of Maine deodorant and/or toothpaste products ("Tom's Products" or the "Products") on or after September 24, 2015" (the "Class"); (ii) certify a subclass of Class members who purchased in New York (the "New York Subclass"), (iii) certify a subclass of Class members who purchased in California (the "California Subclass"), (iv) certify a subclass of Class members who purchased in Florida (the "Florida Subclass"), (v) appoint Anne de Lacour, Loree Moran, and Andrea Wright as representatives of the Class; and (vi) appoint Plaintiffs' counsel, Bursor & Fisher, P.A., as Class Counsel. Plaintiffs hereby request oral argument on the instant motion.

Dated: June 15, 2018

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Neal J. Deckant
Neal J. Deckant

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